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MORRISON COHEN LLP

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Counsel to Orchard Hotel, LLC

Hearing Date and Time: February 25, 2015 at 2:00 p.m.

| UNITED STA | TES | BANKI | RUPI | ICY | COURT |
|-------------------|------|-------|------|------------|-------|
| SOUTHERN | DIST | TRICT | OF N | EW | YORK |

| In re: | : | Chapter 11 |
|-------------------|---|--------------------------|
| D.A.B. GROUP LLC, | : | Case No.: 14-12057 (SCC) |
| | : | |

Debtor

NOTICE OF MOTION OF ORCHARD HOTEL, LLC FOR LIMITED RELIEF FROM THE AUTOMATIC STAY TO PERMIT STATE COURT APPELLATE PROCEEDINGS TO PROCEED

PLEASE TAKE NOTICE that a hearing will be held before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, located at One Bowling Green, Courtroom 623, New York, NY 10004 on February 25, 2015 at 2:00 p.m. to consider the Motion of Orchard Hotel LLC for Limited Relief from the Automatic Stay to Permit State Court Appellate Proceedings to Proceed, filed by Orchard Hotel LLC pursuant to Bankruptcy Rules 4001, 9014, and 9006.

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the relief sought shall be filed in writing through the Clerk's ECF system, with a copy delivered to the Chambers of

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Judge Chapman, and served upon counsel for Orchard Hotel LLC, Morrison Cohen LLP, 909 Third Avenue, 27th Floor, New York, NY 10029, so as to be received no later than 5:00 p.m. on February 18, 2015.

Dated: February 10, 2015 New York, N.Y.

MORRISON COHEN LLP

By: /s/ Joseph T. Moldovan

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